Attorney Docket No. 400.225US01

## **REMARKS**

Claims 1, 6, 11, 14, 18, 19, and 24 are currently amended. Applicant respectfully submits that the amendments contained herein are fully supported by the specification and drawings as originally filed and do not contain new matter.

## Claim Rejections Under 35 U.S.C. § 102

Claims 1-4, 6-8, 10, 11, 13-15, 17-20, 22-28, and 30-31 were rejected under 35 U.S.C. § 102(b) as being anticipated by Robinson (U.S. Patent No. 5,937,423). Applicant respectfully traverses.

Claims 1, 11, 14, 18, 19, and 24, as currently amended, each recite that a bus controller of a memory device controller is coupled between an array of flash memory cells of the memory device and a command user interface of the memory device. This means that the array of flash memory cells and the command user interface of the memory device are part of the same memory device.

The Examiner has taken flash memory device 27 and blocks of flash EEPROM memory cells 68 of Figure 3 of Robinson as respectively corresponding to the memory device and the array of flash memory cells of each of claims 1, 11, 14, 18, 19, and 24. The Examiner has taken a bridge circuit 14 of Figure 2 of Robinson as corresponding to the bus controller of each of claims 1, 11, 14, 18, 19, and 24. There is no indication in Robinson of a command user interface coupled between the blocks of flash EEPROM memory cells 68 and bridge circuit 14. Rather, flash memory device 27 includes an interface 30 that is coupled between flash EEPROM memory cells 68 and bridge circuit 14. That is, bridge circuit 14 is not coupled between interface 30 and flash EEPROM memory cells 68 as required by each of claims 1, 11, 14, 18, 19, and 24.

Moreover, the Examiner took a command user interface ("CUI") (Figure 2) of a flash EEPROM device 24 of a flash memory array 23 as corresponding to the command user interface of each of claims 11, 14, 18, 19, and 24. However, the command user interface of flash EEPROM device 24 is not part of the flash memory device 27 that includes blocks of flash EEPROM memory cells 68, as is shown in Figure 2. Moreover, the command user interface of

Seliai No. 10/722,110

Title: MEMORY DEVICE CONTROLLER

flash EEPROM device 24 is designed to receive all commands addressed to the individual flash device 24 (column 7, lines 32-34), further indicating that the command user interface of flash EEPROM device 24 is not part of the flash memory device 27 blocks of flash EEPROM memory cells 68. Also, the command user interface of flash EEPROM device 24 is coupled between bridge circuit 14 and blocks 25 of memory transistors (Figure 2) of flash EEPROM device 24, meaning that bridge circuit 14 is not coupled between the command user interface of flash EEPROM device 24 and blocks 25 of memory transistors. Therefore, Robinson does not teach that a bus controller of a memory device controller is coupled between an array of flash memory cells of the memory device and a command user interface of the memory device. Thus, Robinson does not include each and every recitation of claim 1, 11, 14, 18, 19, or 24, so claims 1, 11, 14, 18, 19, and 24 should be allowed.

Claims 2-4, 6-8, and 10 depend from claim 1 and are thus allowable for at least the same reasons as claim 1. Claim 13 depends from claim 11 and is thus allowable for at least the same reasons as claim 11. Claims 15 and 17 depend from claim 14 and are thus allowable for at least the same reasons as claim 14. Claims 20 and 22-23 depend from claim 19 and are thus allowable for at least the same reasons as claim 19. Claims 25-28 and 30-31 depend from claim 24 and are thus allowable for at least the same reasons as claim 24. Therefore, claims 2-4, 6-8, 11, 13-15, 17-20, 22-28, and 30-31 should be allowed.

#### Claim Rejections Under 35 U.S.C. § 103

Claim 5 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Robinson (U.S. Patent No. 5,937,423). Applicant respectfully traverses.

The taking of Official Notice that Robinson implies that a series of clocks are used to facilitate operations and that the exact number of clocks lacks patentable significance fails to overcome the deficiencies of Robinson with regard to claim 1. Claim 5 depends from claim 1 and is thus allowable for at least the same reasons as claim 1.

Claims 9, 12, 16, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Robinson (U.S. Patent No. 5,937,423) and in view of Radcliff (U.S. Patent No. 4,797,876). Applicant respectfully traverses.

Serial No. 10/722,110

Attorney Docket No. 400.225US01

Title: MEMORY DEVICE CONTROLLER

Claims 1, 11, 14, and 19, as currently amended, are each patentably distinct from Robinson. Robinson in combination with Radcliff fails to overcome the deficiencies of Robinson with respect to each of claims 1, 11, 14, and 19. Therefore, claims 1, 11, 14, and 19 are allowable over Robinson in view of Radcliff. Claim 9 depends from claim 1 and is thus allowable for at least the same reasons as claim 1. Claim 12 depends from claim 11 and is thus allowable for at least the same reasons as claim 11. Claim 16 depends from claim 14 and is thus allowable for at least the same reasons as claim 14. Claim 21 depends from claim 19 and is thus allowable for at least the same reasons as claim 19. Therefore, claims 9, 12, 16, and 21 should be allowed.

# REPLY UNDER 37 CFR 1.116 –

**EXPEDITED PROCEDURE - TECHNOLOGY CENTER 2100** 

Serial No. 10/722,110

Attorney Docket No. 400.225US01

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PAGE 14

Title: MEMORY DEVICE CONTROLLER

## **CONCLUSION**

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 501373.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2208.

Respectfully submitted,

Date: 10 - 05 - 06

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